

2023 MISSOURI ATTORNEY GENERAL’S OPINIONS

MISSOURI ATTORNEY GENERAL’S OPINIONS

| Opinion | Date | Topic | Summary |
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| 1-2023 | Jan 12 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-024). |
| 2-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Roland amending Article VIII of the Missouri Constitution (2024-013). |
| 3-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Roland amending Article VIII of the Missouri Constitution (2024-014). |
| 4-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Roland amending Article VIII of the Missouri Constitution (2024-015). |
| 5-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-025). |
| 6-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-026). |
| 7-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-027). |
| 8-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-028). |
| 9-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-029). |
| 10-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-030). |
| 11-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-006). |
| 12-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-007). |
| 13-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-008). |
| 14-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Chapter 130 & 143, RSMo (2024-009). |

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| 15-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Chapter 192, RSMo (2024-010). |
| 16-2023 | Jan 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Wisnton Apple amending Chapter 286 & 143, RSMo (2024-010). |
| 17-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-031). |
| 18-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-032). |
| 19-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-033). |
| 20-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-034). |
| 21-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-035). |
| 22-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-036). |
| 23-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-037). |
| 24-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-038). |
| 25-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-039). |
| 26-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-040). |
| 27-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-041). |
| 28-2023 | Jan 19 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-042). |
| 29-2023 | Jan 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Article VIII of the Missouri Constitution (2024-012). |
| 30-2023 | Jan 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Roland amending Article VIII of the Missouri Constitution (2024-013). |
| 31-2023 | Jan 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Roland amending Article VIII of the Missouri Constitution (2024-014). |
| 32-2023 | Jan 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Roland amending Article VIII of the Missouri Constitution (2024-015). |

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| 33-2023 | Jan 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-043). |
| 34-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-044). |
| 35-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-045). |
| 36-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-046). |
| 37-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-047). |
| 38-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-048). |
| 39-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-049). |
| 40-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-050). |
| 41-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-051). |
| 42-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-052). |
| 43-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-053). |
| 44-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-054). |
| 45-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-055). |
| 46-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-056). |
| 47-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-057). |
| 48-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-058). |
| 49-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-059). |
| 50-2023 | Jan 30 | INITIATIVES. | Review and approval of the sufficiency as to form of an initiative petition |

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| | | INITIATIVE PETITIONS. | submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-060). |
| 51-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-061). |
| 52-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-016). |
| 53-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-017). |
| 54-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-018). |
| 55-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-019). |
| 56-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-020). |
| 57-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-021). |
| 58-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-022). |
| 59-2023 | Jan 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-023). |
| 60-2023 | Feb 2 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-062). |
| 61-2023 | Feb 2 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-024). |
| 62-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-025). |
| 63-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-026). |
| 64-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-027). |

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| 65-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-028). |
| 66-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-029). |
| 67-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-030). |
| 68-2023 | Feb 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Elad Gross amending Article III of the Missouri Constitution (2024-063). |
| 69-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-031). |
| 70-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-032). |
| 71-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-033). |
| 72-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-034). |
| 73-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-035). |
| 74-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-036). |
| 75-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-037). |
| 76-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-038). |
| 77-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-039). |
| 78-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-040). |
| 79-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending |

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| | | | Chapter 290, RSMo (2024-041). |
| 80-2023 | Feb 6 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-042). |
| 81-2023 | Feb 9 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-064). |
| 82-2023 | Feb 9 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-065). |
| 83-2023 | Feb 9 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-066). |
| 84-2023 | Feb 9 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-067). |
| 85-2023 | Feb 9 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-068). |
| 86-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-016). |
| 87-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-017). |
| 88-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-018). |
| 89-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-019). |
| 90-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-020). |
| 91-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-021). |
| 92-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-022). |
| 93-2023 | Feb 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Terrence Wise amending Chapter 290, RSMo (2024-023). |

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| 94-2023 | Feb 14 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-024). |
| 95-2023 | Feb 14 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-043). |
| 96-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-044). |
| 97-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-045). |
| 98-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-046). |
| 99-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-047). |
| 100-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-048). |
| 101-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-049). |
| 102-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-050). |
| 103-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-051). |
| 104-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-052). |
| 105-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-053). |
| 106-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-054). |
| 107-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-055). |
| 108-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending |

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| | | | Chapter 290, RSMo (2024-056). |
| 109-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-057). |
| 110-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-058). |
| 111-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-059). |
| 112-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-060). |
| 113-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-061). |
| 114-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-025). |
| 115-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-026). |
| 116-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-027). |
| 117-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-028). |
| 118-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-029). |
| 119-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Lisa D’Souza amending Chapter 290, RSMo (2024-030). |
| 120-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-062). |
| 121-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Elad Gross amending Article III of the Missouri Constitution (2024-063). |
| 122-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-031). |
| 123-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-032). |
| 124-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-033). |

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| 125-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-034). |
| 126-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-035). |
| 127-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-036). |
| 128-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-037). |
| 129-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-038). |
| 130-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-039). |
| 131-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-040). |
| 132-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-041). |
| 133-2023 | Feb 22 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard von Glahn amending Chapter 290, RSMo (2024-042). |
| 134-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-043). |
| 135-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Harry Cooper amending Article III of the Missouri Constitution (2024-070). |
| 136-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Harry Cooper amending Article III of the Missouri Constitution (2024-071). |
| 137-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-064). |
| 138-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-065). |
| 139-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending |

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| | | | Article VIII of the Missouri Constitution (2024-066). |
| 140-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-067). |
| 141-2023 | Feb 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-068). |
| 142-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article I of the Missouri Constitution (2024-072). |
| 143-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-073). |
| 144-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article IV of the Missouri Constitution (2024-074). |
| 145-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-044). |
| 146-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-045). |
| 147-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-046). |
| 148-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-047). |
| 149-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-048). |
| 150-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Speidel amending Article VI of the Missouri Constitution (2024-049). |
| 151-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-050). |
| 152-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-051). |
| 153-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-052). |

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| 154-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-053). |
| 155-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-054). |
| 156-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-055). |
| 157-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-056). |
| 158-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-057). |
| 159-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-058). |
| 160-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-059). |
| 161-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-060). |
| 162-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Richard Von Glahn amending Chapter 290, RSMo (2024-061). |
| 163-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-062). |
| 164-2023 | Mar 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Elad Gross amending Article III of the Missouri Constitution (2024-063). |
| 165-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-075). |
| 166-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-064). |
| 167-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-065). |
| 168-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri |

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| | | | Constitution (2024-066). |
| 169-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-067). |
| 170-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-068). |
| 171-2023 | Mar 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article III of the Missouri Constitution (2024-076). |
| 172-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Harry Cooper amending Article III of the Missouri Constitution (2024-070). |
| 173-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Harry Cooper amending Article III of the Missouri Constitution (2024-071). |
| 174-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-077). |
| 175-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-078). |
| 176-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-079). |
| 177-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-080). |
| 178-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-081). |
| 179-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-082). |
| 180-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-083). |
| 181-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-084). |
| 182-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-085). |

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| 183-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-086). |
| 184-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Anna Fitz-James amending Article I of the Missouri Constitution (2024-087). |
| 185-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-088). |
| 186-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-089). |
| 187-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-090). |
| 188-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-091). |
| 189-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-092). |
| 190-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-093). |
| 191-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-094). |
| 192-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-095). |
| 193-2023 | Mar 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Frederic Steinbach amending Article VIII of the Missouri Constitution (2024-096). |
| 194-2023 | Mar 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple per amending Article I of the Missouri Constitution (2024-072). |
| 195-2023 | Mar 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple per amending Article III of the Missouri Constitution (2024-073). |
| 196-2023 | Mar 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple per amending Article IV of the Missouri Constitution (2024-074). |
| 197-2023 | Mar 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Madeline Smith amending Chapter 213, RSMo (2024-097). |

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| 198-2023 | Mar 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Madeline Smith amending Article I of the Missouri Constitution (2024-098). |
| 199-2023 | Mar 31 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article I of the Missouri Constitution (2024-099). |
| 200-2023 | Mar 31 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Winston Apple amending Article IV of the Missouri Constitution (2024-100). |
| 201-2023 | Apr 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple per amending Article III of the Missouri Constitution (2024-075). |
| 202-2023 | Apr 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple per amending Article III of the Missouri Constitution (2024-076). |
| 203-2023 | Apr 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Harry Cooper amending Article III of the Missouri Constitution (2024-070). |
| 204-2023 | Apr 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Harry Cooper amending Article III of the Missouri Constitution (2024-071). |
| 205-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple per amending Article IV of the Missouri Constitution (2024-074). |
| 206-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-077). |
| 207-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-078). |
| 208-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-079). |
| 209-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-080). |
| 210-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-081). |
| 211-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-082). |
| 212-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending |

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| | | | Article I of the Missouri Constitution (2024-083). |
| 213-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-084). |
| 214-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-085). |
| 215-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-086). |
| 216-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-087). |
| 217-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-088). |
| 218-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-089). |
| 219-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-090). |
| 220-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-091). |
| 221-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-092). |
| 222-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-093). |
| 223-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-094). |
| 224-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-095). |
| 225-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-096). |
| 226-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-101). |

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| 227-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-102). |
| 228-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-103). |
| 229-2023 | Apr 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-104). |
| 230-2023 | Apr 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple per amending Article III of the Missouri Constitution (2024-075). |
| 231-2023 | Apr 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple per amending Article III of the Missouri Constitution (2024-076). |
| 232-2023 | Apr 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple amending Article I of the Missouri Constitution (2024-099). |
| 233-2023 | Apr 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Winston Apple per amending Article IV of the Missouri Constitution (2024-100). |
| 234-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-077). |
| 235-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-078). |
| 236-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-079). |
| 237-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-080). |
| 238-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-081). |
| 239-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-082). |
| 240-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-083). |
| 241-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri |

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| | | | Constitution (2024-084). |
| 242-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-085). |
| 243-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-086). |
| 244-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-087). |
| 245-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-088). |
| 246-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-089). |
| 247-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-090). |
| 248-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-091). |
| 249-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-092). |
| 250-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-093). |
| 251-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-094). |
| 252-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-095). |
| 253-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Frederic Steinbach per amending Article VIII of the Missouri Constitution (2024-096). |
| 254-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Madeline Smith amending Chapter 213, RSMo (2024-105). |
| 255-2023 | Apr 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Madeline Smith amending Article I of the Missouri Constitution (2024-106). |

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| 256-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-101). |
| 257-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-102). |
| 258-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-103). |
| 259-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-104). |
| 260-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-107). |
| 261-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-108). |
| 262-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-109). |
| 263-2023 | Apr 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-110). |
| 264-2023 | May 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple amending Article I of the Missouri Constitution (2024-099). |
| 265-2023 | May 3 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Winston Apple per amending Article IV of the Missouri Constitution (2024-100). |
| 266-2023 | May 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-101). |
| 267-2023 | May 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-102). |
| 268-2023 | May 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-103). |
| 269-2023 | May 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-104). |
| 270-2023 | May 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Madeline Smith amending |

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| | | | Chapter 213, RSMo (2024-105). |
| 271-2023 | May 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Madeline Smith amending Article I of the Missouri Constitution (2024-106). |
| 272-2023 | May 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-107). |
| 273-2023 | May 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-108). |
| 274-2023 | May 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-109). |
| 275-2023 | May 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-110). |
| 276-2023 | May 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Mark Pedersen amending Article XIV of the Missouri Constitution (2024-112). |
| 277-2023 | May 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Madeline Smith amending Chapter 213, RSMo (2024-105). |
| 278-2023 | May 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Madeline Smith amending Article I of the Missouri Constitution (2024-106). |
| 279-2023 | May 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-107). |
| 280-2023 | May 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-108). |
| 281-2023 | May 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-109). |
| 282-2023 | May 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by David Brain amending Article VIII of the Missouri Constitution (2024-110). |
| 283-2023 | June 12 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Mark Pedersen amending Article XIV of the Missouri Constitution (2024-112). |
| 284-2023 | June 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Mark Pedersen amending Article XIV of the Missouri Constitution (2024-112). |

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| 285-2023 | July 6 | SENATE JOINT RESOLUTION. | Review and approval of the legal content and form of a fiscal note summary for Senate Joint Resolution No. 26 |
| 286-2023 | July 6 | FAIR BALLOT LANGUAGE. SENATE JOINT RESOLUTION. | Review and approval of legal content and form of the proposed fair ballot language for Senate Joint Resolution No. 26 |
| 287-2023 | July 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Bradley Ketcher amending Chapter 321, RSMo (2024-113). |
| 288-2023 | July 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-114). |
| 289-2023 | July 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-115). |
| 290-2023 | July 7 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-117). |
| 291-2023 | July 17 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Paul Berry III amending Article I of the Missouri Constitution (2024-118). |
| 292-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-077). |
| 293-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-078). |
| 294-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-079). |
| 295-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-080). |
| 296-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-081). |
| 297-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-082). |
| 298-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-083). |
| 299-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-084). |

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| 300-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-085). |
| 301-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-086). |
| 302-2023 | July 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Anna Fitz-James per amending Article I of the Missouri Constitution (2024-087). |
| 303-2023 | Jul 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Bradley Ketcher amending Chapter 321, RSMo (2024-113). |
| 304-2023 | Jul 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-114). |
| 305-2023 | Jul 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-115). |
| 306-2023 | Jul 28 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-117). |
| 307-2023 | Jul 31 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Paul Berry III amending Article I of the Missouri Constitution (2024-119). |
| 308-2023 | Aug 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-120). |
| 309-2023 | Aug 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Theo Brown Sr. amending Chapter 71, RSMo (2024-121). |
| 310-2023 | Aug 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Bradley Ketcher amending Chapter 321, RSMo (2024-113). |
| 311-2023 | Aug 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Paul Berry III amending Article IX of the Missouri Constitution (2024-122). |
| 312-2023 | Aug 14 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-114). |
| 313-2023 | Aug 14 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-115). |
| 314-2023 | Aug 14 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jimmie Edwards amending Article I of the Missouri Constitution (2024-117). |

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| 315-2023 | Aug 15 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-123). |
| 316-2023 | Aug 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-124). |
| 317-2023 | Aug 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-125). |
| 318-2023 | Aug 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-126). |
| 319-2023 | Aug 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-127). |
| 320-2023 | Aug 21 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Paul Berry III amending Article I of the Missouri Constitution (2024-119). |
| 321-2023 | Aug 24 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Paul Berry III amending Article IX of the Missouri Constitution (2024-128). |
| 322-2023 | Sep 05 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Paul Berry III amending Article I of the Missouri Constitution (2024-119). |
| 323-2023 | Sep 05 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-123). |
| 324-2023 | Sep 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-124). |
| 325-2023 | Sep 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-125). |
| 326-2023 | Sep 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-126). |
| 327-2023 | Sep 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-127). |
| 328-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-129). |
| 329-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution |

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| | | | (2024-130). |
| 330-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-131). |
| 331-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-132). |
| 332-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-133). |
| 333-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-134). |
| 334-2023 | Sep 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Paul Berry III amending Article IX of the Missouri Constitution (2024-128). |
| 335-2023 | Sep 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-123). |
| 336-2023 | Sep 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-124). |
| 337-2023 | Sep 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-125). |
| 338-2023 | Sep 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-126). |
| 339-2023 | Sep 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article XII Missouri Constitution (2024-127). |
| 340-2023 | Sep 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-135). |
| 341-2023 | Sep 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-136). |
| 342-2023 | Sep 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-137). |
| 343-2023 | Sep 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-138). |

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| 344-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-139). |
| 345-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-140). |
| 346-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-141). |
| 347-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-142). |
| 348-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-143). |
| 349-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-144). |
| 350-2023 | Sep 25 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Paul Berry III amending Article IX of the Missouri Constitution (2024-128). |
| 351-2023 | Sep 29 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-129). |
| 352-2023 | Sep 29 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-130). |
| 353-2023 | Sep 29 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-131). |
| 354-2023 | Sep 29 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-132). |
| 355-2023 | Sep 29 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-133). |
| 356-2023 | Sep 29 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-134). |
| 357-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-135). |
| 358-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending |

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| | | | Article III Missouri Constitution (2024-136). |
| 359-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-137). |
| 360-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-138). |
| 361-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-139). |
| 362-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-140). |
| 363-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-141). |
| 364-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-142). |
| 365-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-143). |
| 366-2023 | Oct 10 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-144). |
| 367-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-145). |
| 368-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-146). |
| 369-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-147). |
| 370-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-148). |
| 371-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-149). |
| 372-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-150). |

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| 373-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-1501). |
| 374-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-152). |
| 375-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-153). |
| 376-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-154). |
| 377-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-155). |
| 378-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-156). |
| 379-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-157). |
| 380-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-158). |
| 381-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-159). |
| 382-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-160). |
| 383-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-161). |
| 384-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-129). |
| 385-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-130). |
| 386-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-131). |
| 387-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jamie Corley amending Article I of the Missouri |

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| | | | Constitution (2024-132). |
| 388-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-133). |
| 389-2023 | Oct 16 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Jamie Corley amending Article I of the Missouri Constitution (2024-134). |
| 390-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-162). |
| 391-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-163). |
| 392-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-164). |
| 393-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the sufficiency as to form of an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-165). |
| 394-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-135). |
| 395-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-136). |
| 396-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-137). |
| 397-2023 | Oct 23 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III Missouri Constitution (2024-138). |
| 398-2023 | Oct 26 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by JoAnn Franklin amending Article XV of the Missouri Constitution (2024-166). |
| 399-2023 | Oct 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-139). |
| 400-2023 | Oct 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-140). |
| 401-2023 | Oct 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-141). |

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| 402-2023 | Oct 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-142). |
| 403-2023 | Oct 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-143). |
| 404-2023 | Oct 30 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article I of the Missouri Constitution (2024-144). |
| 405-2023 | Nov 02 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-145). |
| 406-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-154). |
| 407-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-155). |
| 408-2032 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-156). |
| 409-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-157). |
| 410-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-158). |
| 411-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-159). |
| 412-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-160). |
| 413-2023 | Nov 03 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-161). |
| 414-2023 | Nov 07 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by JoAnn Franklin amending Article XV of the Missouri Constitution (2024-167). |
| 415-2023 | Nov 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-162). |
| 416-2023 | Nov 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article III |

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| | | | of the Missouri Constitution (2024-163). |
| 417-2023 | Nov 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-164). |
| 418-2023 | Nov 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-165). |
| 419-2023 | Nov 13 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Byron Keelin amending Article I of the Missouri Constitution (2024-145). |
| 420-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-154). |
| 421-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-155). |
| 422-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-156). |
| 423-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-157). |
| 424-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-158). |
| 425-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-159). |
| 426-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-160). |
| 427-2023 | Nov 20 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Alixandra Cossette amending Article III of the Missouri Constitution (2024-161). |
| 428-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by JoAnn Franklin amending Article XV of the Missouri Constitution (2024-168). |
| 429-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Deidre Hirner amending Article XV of the Missouri Constitution (2024-169). |
| 430-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Deidre Hirner amending Article XV of the Missouri Constitution (2024-170). |

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| 431-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-162). |
| 432-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-163). |
| 433-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-164). |
| 434-2023 | Nov 27 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the summary statement prepared for the initiative petition submitted by Greta Bax amending Article III of the Missouri Constitution (2024-165). |
| 435-2023 | Dec 01 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Deidre Hirner amending Article XV of the Missouri Constitution (2024-170). |
| 436-2023 | Dec 11 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by JoAnn Franklin amending Article XV of the Missouri Constitution (2024-168). |
| 437-2023 | Dec 18 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Deidre Hirner amending Article XV of the Missouri Constitution (2024-170). |
| 438-2023 | Dec 14 | INITIATIVES. INITIATIVE PETITIONS. | Review and rejection of the sufficiency as to form of an initiative petition submitted by Deidre Hirner amending Article XV of the Missouri Constitution (2024-172). |
| 439-2023 | Dec 21 | INITIATIVES. INITIATIVE PETITIONS. | Review and approval of the legal content and form of a fiscal note summary prepared for an initiative petition submitted by Deidre Hirner amending Article X of the Missouri Constitution (2024-171). |



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 12, 2023

OPINION LETTER NO. 1-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 3, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Winston Apple, 2024-024.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 2-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 4, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Roland, 24-013. The fiscal note summary that you submitted is as follows:

State and local governmental entities' costs are estimated at \$2.3 million in one-time costs, and ongoing costs of at least \$80,000 annually, \$241,000 each primary election, \$251,000 each general election, and \$199,000 for all other elections. State and local governmental entities' savings are estimated at an unknown amount.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 3-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 4, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Roland, 24-014. The fiscal note summary that you submitted is as follows:

State and local governmental entities' costs are estimated at \$2.3 million in one-time costs, and ongoing costs of at least \$80,000 annually, \$241,000 each primary election, \$251,000 each general election, and \$199,000 for all other elections. State and local governmental entities' savings are estimated at an unknown amount.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 4-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 4, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Roland, 24-015. The fiscal note summary that you submitted is as follows:

State and local governmental entities' costs are estimated at \$2.3 million in one-time costs, and ongoing costs of at least \$80,000 annually, \$341,000 each primary election, \$351,000 each general election, and \$299,000 for all other elections. State and local governmental entities' savings are estimated at an unknown amount.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 5-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 5, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Lisa D'Souza, 2024-025.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 6-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 5, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Lisa D'Souza, 2024-026.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 7-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 5, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Lisa D'Souza, 2024-027.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-007



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 8-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 5, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Lisa D'Souza, 2024-028.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 9-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 5, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Lisa D'Souza, 2024-029.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 10-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 5, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Lisa D'Souza, 2024-030.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 11-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 6, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-006. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to give any county, city, town, or village the right to require employers to pay a minimum wage or employment benefit that exceeds federal or state law, rules, or regulations, regardless of any action of the Missouri General Assembly?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-011



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 12-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 6, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-007. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to prohibit the general assembly from altering, amending, or repealing a statute that was approved by the voters through the initiative process unless the general assembly submits the proposed changes to the voters and the changes are approved by a majority of the voters?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-012



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 13-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 6, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-008. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- change voting in general elections for the offices of governor, lieutenant governor, secretary of state, attorney general, state treasurer, state auditor and United States senator, if more than two candidates appear on the ballot at either a primary or general election, to allow voters to rank candidates in order of preference for each office;
- eliminate the lowest ranked candidates and redistribute their votes based on number of votes and voters' rankings until a candidate receives at least 50% plus one vote to win; and
- resolve ties with random mathematical process?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-013



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 14-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 6, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-009. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- create the Missouri Elections Trust Fund to be administered by the Department of Revenue;
- create a \$5 state income tax return checkoff to finance the Fund; and
- use the money to provide matching public funding, based on campaign filings with the Missouri Ethics Commission, for candidates for elected office who agree (1) to not accept contributions from corporations or political action committees that accept corporate contributions; and (2) that at least one-half of all money raised by the candidate will come from individuals contributing \$200 or less per election cycle?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-014



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 15-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 6, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-010. The proposed summary statement is as follows:

Do you want to amend Missouri law to create a state-run health insurance cooperative provided through the Department of Health and Senior Services, allowing Missouri citizens the choice to participate in the state-run Department of Health and Senior Services, allowing Missouri citizens the choice to participate in the state-run health cooperative that provides coverage for treatment and procedures only covered by Medicare and Medicaid to take effect on January 1, 2024; with membership dues (premiums) based on a percentage of the member's federal taxable income from the most recent tax return, paid monthly and adjusted annually based on income?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-015



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 17, 2023

OPINION LETTER NO. 16-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 6, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-011. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- impose a state tax on long-term capital gains and qualified dividends (gains and dividends) in an amount equal to the difference between the federal taxes paid on gains and dividends and the rate that would have been paid had the gains or dividends been taxed as marginal ordinary income; and
- use these tax revenues to increase the percentage of electricity generated by clean, renewable sources in Missouri until 90% or more of the state's electricity is from clean, renewable sources?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-016



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 17-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-031.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 18-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-032.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 19-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-033.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 20-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-034.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 21-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-035.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 22-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-036.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 23-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-037.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 24-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-038.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-024



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 25-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-039.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 26-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-040.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 27-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-041.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 19, 2023

OPINION LETTER NO. 28-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 9, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-042.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 24, 2023

OPINION LETTER NO. 29-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 13, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-12. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- do away with party designation and primary elections for the office of governor, lieutenant governor, secretary of state, attorney general, state treasurer, state auditor, United States senator, United States representative, state senator, state representative, and circuit judge;
- make the general election a runoff between a minimum of five candidates for each office using ranked choice voting; and
- use a random selection algorithm prior to tabulation to resolve ties between candidates if one should occur?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 24, 2023

OPINION LETTER NO. 30-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 13, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Roland, 2024-013. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- make primary elections for statewide office, Missouri General Assembly and United States Congress open elections in which all candidates appear on a single ballot;
- make general elections for statewide office, Missouri General Assembly and United States Congress a runoff between the top four candidates for each office from the open primary elections using ranked choice voting; and
- fill vacancies for statewide office, Missouri General Assembly and United States Congress by special election?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 24, 2023

OPINION LETTER NO. 31-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 13, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Roland, 2024-014. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- make primary open elections with all candidates for statewide office, Missouri General Assembly and United States Congress appearing on a single ballot;
- make general election a runoff between the top four candidates for each office from the open primary elections using ranked choice voting;
- fill vacancies for statewide office, Missouri General Assembly, and United States Congress with special elections; and
- disallow the general assembly from enacting laws hindering establishment of open primaries and instant runoffs?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 24, 2023

OPINION LETTER NO. 32-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 13, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Roland, 2024-015. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- make primaries open elections with all candidates for statewide offices, Missouri General Assembly, county offices, and the United States Congress, appearing on a single ballot;
- make general election a runoff between the top four candidates for each office from the open primary elections using ranked choice voting;
- fill vacancies for statewide offices, Missouri General Assembly, county offices, and the United States Congress with special elections; and
- disallow the general assembly from enacting laws hindering establishment of open primaries and instant runoffs?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 24, 2023

OPINION LETTER NO. 33-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 13, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-043.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 34-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VI, of the Missouri Constitution submitted by Richard Speidel, 2024-044.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-034



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 35-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VI, of the Missouri Constitution submitted by Richard Speidel, 2024-045.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 36-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VI, of the Missouri Constitution submitted by Richard Speidel, 2024-046.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-036



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 37-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VI, of the Missouri Constitution submitted by Richard Speidel, 2024-047.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 38-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VI, of the Missouri Constitution submitted by Richard Speidel, 2024-048.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 39-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VI, of the Missouri Constitution submitted by Richard Speidel, 2024-049.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-039



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 40-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-050.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 41-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-051.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 42-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-052.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2024-042



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 43-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-053.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 44-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-054.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 45-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-055.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 46-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-056.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 47-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-057.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2024-047



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 48-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-058.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2024-048



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 49-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-059.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 50-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-060.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 51-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 18, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 290, Revised Statutes of Missouri, submitted by Richard von Glahn, 2024-061.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 52-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-016. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 53-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-017. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 54-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-018. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 55-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-019. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 56-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-020. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 57-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-021. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 58-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-022. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 30, 2023

OPINION LETTER NO. 59-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Terrence Wise, 2024-023. The fiscal note summary that you submitted is as follows:

State and local governments estimate no direct costs or savings from the proposal, but operating costs could increase by an unknown annual amount. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 2, 2023

OPINION LETTER NO. 60-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 23, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-062.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 2, 2023

OPINION LETTER NO. 61-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 23, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-024. The fiscal note summary that you submitted is as follows:

State government legislative operating costs are estimated to decrease by approximately \$282,000 annually. State and local governmental entities estimate one-time costs of at least \$695,000, and ongoing costs of at least \$120,000 every general election year.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 62-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Lisa D'Souza, 2024-025. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings, one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to \$256,000 per year by 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 63-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Lisa D'Souza, 2024-026. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings, one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to \$256,000 per year by 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 64-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Lisa D'Souza, 2024-027. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings, one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to \$256,000 per year by 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 65-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Lisa D'Souza, 2024-028. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings, one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to \$256,000 per year by 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 66-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Lisa D'Souza, 2024-029. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings, one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to \$256,000 per year by 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 67-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Lisa D'Souza, 2024-030. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings, one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to \$256,000 per year by 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 3, 2023

OPINION LETTER NO. 68-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 24, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Elad Gross, 2024-063.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 69-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-031. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-69



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 70-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-032. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-70



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 71-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-033. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-71



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 72-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-034. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-72



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 73-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-035. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-73



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 74-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-036. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-74



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 75-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-037. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-75



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 76-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-038. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-76



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 77-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-039. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-77



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 78-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-040. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-78



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 79-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-041. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-79



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 6, 2023

OPINION LETTER NO. 80-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of January 27, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-042. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-80



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 9, 2023

OPINION LETTER NO. 81-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 30, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-064.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 9, 2023

OPINION LETTER NO. 82-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 30, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-065.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 9, 2023

OPINION LETTER NO. 83-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 30, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-066.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 9, 2023

OPINION LETTER NO. 84-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 30, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-067.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 9, 2023

OPINION LETTER NO. 85-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 30, 2023 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-068.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-085



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 86-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-016. The proposed summary statement is as follows:

Shall Missouri law be amended to:

- increase the state minimum wage to \$13.50 per hour starting January 1, 2025, with \$0.75 per hour increase each year until 2027, when the minimum wage would be \$15.00 per hour; and
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2028?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 87-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-017. The proposed summary statement is as follows:

Shall Missouri law be amended to:

- increase the state minimum wage to \$13.75 per hour starting January 1, 2025, with \$1.25 per hour increase each year until 2027, when the minimum wage would be \$16.25 per hour; and
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2028?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 88-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-018. The proposed summary statement is as follows:

Shall Missouri law be amended to:

- increase the state minimum wage to \$13.75 per hour starting January 1, 2025, with \$1.25 per hour increase, making the minimum wage \$15.00 per hour in January 2026; and
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2027?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 89-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-019. The proposed summary statement is as follows:

Shall Missouri law be amended to:

- increase the state minimum wage to \$14.00 per hour starting January 1, 2025, with \$1.00 per hour increase each year until 2027, when the minimum wage would be \$16.00 per hour; and
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2028?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A blue ink signature of Andrew Bailey is written over a light blue rectangular background.

ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 90-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-020. The proposed summary statement is as follows:

Shall Missouri law be amended to:

- increase the state minimum wage to \$13.50 per hour starting January I, 2025, with \$0.75 per hour increase each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2028; and
- increase the employer portion of tipped employee wages annually until attaining full minimum wage by January I, 2034?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-090



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 91-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-021. The proposed summary statement is as follows:

Shall Missouri law be amended to:

- increase the state minimum wage to \$13.75 per hour starting January 1, 2025, with \$1.25 per hour increase each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2028; and
- increase the employer portion of tipped employee wages annually until attaining full minimum wage by January 1, 2034?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-091



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 92-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-022. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- increase the state minimum wage to \$13.75 per hour starting January 1, 2025, with \$1.25 per hour increase, making the minimum wage \$15.00 per hour in January 2026;
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2027; and
- increase the employer portion of tipped employee wages annually until attaining full minimum wage by January 1, 2034?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 10, 2023

OPINION LETTER NO. 93-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated January 31, 2023 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Terrence Wise, 2024-023. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- increase the state minimum wage to \$14.00 per hour starting January 1, 2025, with \$1.00 per hour increase each year until 2027, when the minimum wage would be \$16.00 per hour;
- adjust state minimum wage based on changes in the Consumer Price Index each January beginning in 2028; and
- increase the employer portion of tipped employee wages annually until attaining full minimum wage by January 1, 2034?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 14, 2023

OPINION LETTER NO. 94-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 2, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-024. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for a system of rank choice voting with a minimum of three candidates for senator and representative in order of voter preference;
- eliminate the primary election in 2026 for state legislators;
- list candidates for the general election without party affiliation;
- elect state senators at large, instead of by district;
- reduce the number of state representatives from 163 to 160 (20 members from each of the eight congressional districts); and
- fill vacancies with the highest-ranking unelected candidate?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 14, 2023

OPINION LETTER NO. 95-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 2, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-043. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings for this proposal. Local governmental entities estimate costs could increase by at least \$40,000 each municipal general election, \$51,000 each primary election, and \$52,000 each general election.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 96-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard Speidel, 2024-044. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no cost or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-096



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 97-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard Speidel, 2024-045. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no cost or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-097



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 98-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard Speidel, 2024-046. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no cost or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-098



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 99-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard Speidel, 2024-047. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no cost or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-099



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 100-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard Speidel, 2024-048. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no cost or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-100



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 101-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard Speidel, 2024-049. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no cost or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-101



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 102-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-050. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 103-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-051. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 104-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-052. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 105-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-053. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 106-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-054. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 107-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-055. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 108-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-056. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 109-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-057. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 110-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-058. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 111-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-059. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 112-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-060. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 113-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 7, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Richard von Glahn, 2024-061. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs ranging from \$0 to \$53,000, and ongoing costs ranging from \$0 to at least \$256,000 per year by 2027. State and local government tax revenue could change by an unknown annual amount depending on business decisions.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 114-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 9, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Lisa D'Souza, 2024-025. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- require employers, beginning May 1, 2025, with fifteen or more employees provide one hour of paid sick leave for every thirty hours worked, using no more than fifty-six hours annually;
- require employers with fewer than fifteen employees provide the same paid sick leave, using no more than forty hours annually;
- allow up to 80 hours of earned paid sick time to carry over annually;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 115-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 9, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Lisa D'Souza, 2024-026. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- require employers, beginning May 1, 2025, with fifteen or more employees provide one hour of paid sick leave for every thirty hours worked but limit using no more than fifty-six hours annually;
- require employers with fewer than fifteen employees provide the same paid sick leave but limit using no more than forty hours annually;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 116-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 9, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Lisa D'Souza, 2024-027. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- require employers, beginning May 1, 2025, with fifteen or more employees provide one hour of paid sick leave for every thirty hours worked but limit using no more than fifty-six hours annually;
- require employers with fewer than fifteen employees provide the same paid sick leave but limit using no more than forty hours annually;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 117-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 9, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Lisa D'Souza, 2024-028. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- require employers, beginning May 1, 2025, with fifteen or more employees provide one hour of paid sick leave for every thirty hours worked but limit using no more than forty hours annually;
- require employers with fewer than fifteen employees provide the same paid sick leave but limit using no more than twenty-four hours annually;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 118-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 9, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Lisa D'Souza, 2024-029. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- require employers, beginning May 1, 2025, with fifteen or more employees provide one hour of paid sick leave for every thirty hours worked, using no more than forty hours annually;
- require employers with fewer than fifteen employees provide the same paid sick leave, limit using no more than twenty-four hours annually;
- allow up to 80 hours of earned paid sick time to carry over annually;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 119-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 9, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Lisa D'Souza, 2024-030. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- require employers, beginning May 1, 2025, with fifteen or more employees provide one hour of paid sick leave for every thirty hours worked, using no more than forty hours annually;
- require employers with fewer than fifteen employees provide the same paid sick leave, using no more than twenty-four hours annually;
- allow up to 80 hours of earned sick time to carry over annually;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 120-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of February 10, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-062. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-120



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 121-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of February 10, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Elad Gross, 2024-063. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-121



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 122-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-031. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-122



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 123-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-032. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 124-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-033. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 125-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-034. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 126-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-035. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 127-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-036. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 128-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-037. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2026, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2027;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 129-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-038. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2026, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2027;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 130-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-039. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 131-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-040. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$14.00 per hour, increasing \$1.00 per hour each year until 2027, when the minimum wage would be \$16.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 132-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-041. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$14.00 per hour, increasing \$1.00 per hour each year until 2027, when the minimum wage would be \$16.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 22, 2023

OPINION LETTER NO. 133-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 10, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-042. The proposed summary statement is as follows:

Do you want to amend Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 134-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 16, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-043. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- supersede the statutory prohibition of Direct Recording Electronic voting machines and allow the use through 2024;
- require, except in primaries for federal offices and statewide offices, the candidate who receives the most votes to be declared the winner of the election;
- require election authorities update voter rolls upon notification by a state or federal agency; and
- allow an election authority to request the secretary of state provide technical assistance and recommended guidelines for the management, administration, and accuracy of voter rolls and registrations maintained and used by any election authority?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 135-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 17, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Harry Cooper, 2024-070.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 136-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 17, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Harry Cooper, 2024-071.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 137-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 17, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-064. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 138-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 17, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-065. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings for this proposal. Local governmental entities estimate costs could increase by at least \$33,500 to \$85,000 each municipal general election, \$35,121 to \$86,621 each primary election, and \$41,249 to \$92,749 each general election.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 139-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 17, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-066. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 140-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 17, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-067. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings for this proposal. Local governmental entities estimate costs could increase by at least \$33,500 to \$85,000 each municipal general election, \$35,121 to \$86,621 each primary election, and \$41,249 to \$92,749 each general election.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

February 27, 2023

OPINION LETTER NO. 141-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of February 17, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-068. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings for this proposal. Local governmental entities estimate costs could increase by at least \$33,500 to \$85,000 each municipal general election, \$35,121 to \$86,621 each primary election, and \$41,249 to \$92,749 each general election.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 142-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 22, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Winston Apple, 2024-072.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-143



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 143-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 22, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Winston Apple, 2024-073.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-144



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 144-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 22, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article IV, of the Missouri Constitution submitted by Winston Apple, 2024-074.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-145



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 145-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard Speidel, 2024-044. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow any city, town, village or municipality containing more than ten thousand inhabitants including incorporated and unincorporated cities and towns and all counties to enact ordinances or regulations which establish and enforce standards or requirements relating to a workplace, employment, affordable housing, predatory lending, safety and environmental matters but shall not apply to employees of the state, to public works undertaken by the state, to purchases by the state, to land, housing, or facilities owned by the state or to corporations owned or operated by the state and other political subdivisions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 146-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard Speidel, 2024-045. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow any city, town, village or municipality containing more than ten thousand inhabitants including incorporated and unincorporated cities and towns and all counties to enact ordinances or regulations which establish and enforce standards or requirements relating to minimum or living wage, paid or unpaid vacation and sick leave, and paid or unpaid meal periods or break times but shall not apply to employees of the state or other political subdivisions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-147



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 147-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard Speidel, 2024-046. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow any city, town, village or municipality containing more than ten thousand inhabitants including incorporated and unincorporated cities and towns and all counties to enact ordinances or regulations which establish and enforce standards or requirements relating to minimum or living wage and paid or unpaid vacation and sick leave but shall not apply to employees of the state or other political subdivisions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-148



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 148-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard Speidel, 2024-047. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow any city, town, village or municipality containing more than ten thousand inhabitants including incorporated and unincorporated cities and towns and all counties to enact ordinances or regulations which establish and enforce standards or requirements relating to minimum wage, vacation and sick leave, meal or break times and limits and restrictions to rent and fees charged for privately-owned single or multiple-unit residential property but shall not apply to state employees, to state owned land, housing, or facilities or to corporations owned or operated by the state and other political subdivisions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-149



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 149-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard Speidel, 2024-048. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow any city, town, village or municipality containing more than ten thousand inhabitants including incorporated and unincorporated cities and towns and all counties to enact ordinances or regulations which establish and enforce standards or requirements that relate to limiting or restricting the amount of rent and fees charged for privately-owned single or multiple-unit residential property but shall not apply to state owned land, housing, or facilities or to corporations owned or operated by the state and other political subdivisions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-150



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 150-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard Speidel, 2024-049. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow cities, towns, villages or municipalities containing more than ten thousand inhabitants including incorporated and unincorporated cities and towns and all counties to enact ordinances or regulations which establish and enforce standards or requirements relating to minimum wage, vacation and sick leave, prevailing wages and procurement and contract for services but shall not apply to employees of the state, public works undertaken by the state, purchases by the state, land, housing, or facilities owned by the state or corporations owned or operated by the state and other political subdivisions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-151



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 151-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-050. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$14.00 per hour, increasing \$1.00 per hour each year until 2027, when the minimum wage would be \$16.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-152



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 152-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-051. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$14.00 per hour, increasing \$1.00 per hour each year until 2027, when the minimum wage would be \$16.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-153



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 153-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-052. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$14.00 per hour, increasing \$1.00 per hour each year until 2027, when the minimum wage would be \$16.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-154



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 154-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-053. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2026, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2027;
- require employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 155-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-054. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2026, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2027;
- require all employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-156



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 156-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-055. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January I, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2026, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on the Consumer Price Index each January beginning in 2027;
- require employers provide one hour paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-157



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 157-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-056. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-158



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 158-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-057. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-159



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 159-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-058. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.75 per hour, increasing \$1.25 per hour each year until 2027, when the minimum wage would be \$16.25 per hour;
- adjust minimum wage based on the Consumer Price Index each January beginning in 2028;
- require employers provide one hour paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-160



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 160-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-059. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts, education institutions and some specific construction employees?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-161



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 161-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-060. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on changes in the Consumer Price Index each January beginning in 2028;
- require all employers to provide one hour of paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement; and
- exempt governmental entities, political subdivisions, school districts and education institutions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-162



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 162-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Richard von Glahn, 2024-061. The proposed summary statement is as follows:

Do you want to amend the Missouri law to:

- increase minimum wage January 1, 2025 to \$13.50 per hour, increasing \$0.75 per hour each year until 2027, when the minimum wage would be \$15.00 per hour;
- adjust minimum wage based on the Consumer Price Index each January beginning in 2028;
- require employers provide one hour paid sick leave for every thirty hours worked and provide meal and rest breaks;
- allow the Department of Labor and Industrial Relations to provide oversight and enforcement;
- exempt governmental entities, political subdivisions, school districts and education institutions; and
- allow collective bargaining agreements to waive these requirements?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-163



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 163-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-062. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require in a party primary election that each eligible registered voter receive one and only one political party ballot;
- require election authorities update voter rolls upon notification by a state or federal agency;
- require ballot titles whether proposed by the General Assembly, or through citizen initiative or referendum to only include language found in the proposed measure; and
- guarantee that all established political parties in the state the right to have their designated nominees appear on the general election ballot?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-164



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 7, 2023

OPINION LETTER NO. 164-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 24, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Elad Gross, 2024-063. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- replace term limits of eight years in the House and eight years in the Senate with an overall term limit of sixteen years total in the legislature;
- prohibit the legislature from proposing any measure restricting Missourians' power of initiative; and
- forbid the legislature from changing any voter-initiated law without a referendum at a general election or three-quarters' consent in the House and in the Senate, unless more than seven years have passed since voters approved the law?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-165



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 165-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 2, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Winston Apple, 2024-075.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 166-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 3, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-064. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require in a party primary election that each eligible registered voter receive one and only one political party ballot;
- allow for the designating of election observers;
- require ballot titles whether proposed by the General Assembly, or through citizen initiative or referendum to only include language found in the proposed measure; and
- guarantee all established political parties in the state the right to have their designated nominees appear on the general election ballot?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 167-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated March 3, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-065. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require in a party primary election that each eligible registered voter receive one and only one political party ballot;
- allow for the designating of election observers;
- require election authorities to conduct a manual audit of randomly selected precincts;
- require ballot titles whether proposed by the General Assembly, or through citizen initiative or referendum to only include language found in the proposed measure; and
- guarantee all established political parties in the state the right to have their designated nominees appear on the general election ballot?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 168-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 3, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-066. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require in a party primary election that each eligible registered voter receive one and only one political party ballot;
- require election authorities update voter rolls upon notification by state or federal agencies;
- allow for the designating of election observers;
- require ballot titles whether proposed by the General Assembly, or through citizen initiative or referendum to only include language found in the proposed measure; and
- guarantee all established political parties in the state the right to have their designated nominees appear on the general election ballot?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 169-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated March 3, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-067. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require in a party primary election that each eligible registered voter receive one and only one political party ballot;
- require election authorities to conduct a random manual audit of selected precincts;
- require election authorities update voter rolls upon notification by state or federal agencies;
- require ballot titles whether proposed by the General Assembly, or through citizen initiative or referendum to only include language found in the proposed measure; and
- guarantee all established political parties in the state the right to have their designated nominees appear on the general election ballot?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 170-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 3, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-068. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require in a party primary election that each eligible registered voter receive one and only one political party ballot;
- require election authorities to conduct a random manual audit of selected precincts;
- require ballot titles whether proposed by the General Assembly, or through citizen initiative or referendum to only include language found in the proposed measure; and
- guarantee all established political parties in the state the right to have their designated nominees appear on the general election ballot?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 13, 2023

OPINION LETTER NO. 171-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 3, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Winston Apple, 2024-076.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 172-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 9, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Harry Cooper, 2024-070. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 173-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 9, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Harry Cooper, 2024-071. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 174-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-077.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 175-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-078.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 176-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-079.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 177-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-080.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 178-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-081.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 179-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-082.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 180-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-083.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 181-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-084.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 182-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-085.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 183-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-086.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 184-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Anna Fitz-James, 2024-087.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 185-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-088.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 186-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-089.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 187-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-090.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 188-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-091.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 189-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-092.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 190-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-093.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 191-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-094.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 192-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-095.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 20, 2023

OPINION LETTER NO. 193-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 9, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by Frederic Steinbach, 2024-096.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

March 24, 2023

OPINION LETTER NO. 194-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of March 14, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-072. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

March 24, 2023

OPINION LETTER NO. 195-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of March 14, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-073. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

March 24, 2023

OPINION LETTER NO. 196-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 14, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-074. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 27, 2023

OPINION LETTER NO. 197-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 16, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Madeline Smith, Chapter 213, 2024-097.

We conclude that the petition must be rejected for at least the following reasons:

fails to comply with the form in section 116.040.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and "make a final decision as to the approval or rejection of the form of the petition."

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 27, 2023

OPINION LETTER NO. 198-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 16, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Madeline Smith, Article I, 2024-098.

We conclude that the petition must be rejected for at least the following reasons:

fails to comply with the form in section 116.040.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and "make a final decision as to the approval or rejection of the form of the petition."

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 31, 2023

OPINION LETTER NO. 199-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 20, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Winston Apple, 2024-099.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

March 31, 2023

OPINION LETTER NO. 200-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 20, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article IV, of the Missouri Constitution submitted by Winston Apple, 2024-100.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 3, 2023

OPINION LETTER NO. 201-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 22, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-075. The fiscal note summary that you submitted is as follows:

State costs could increase if this petition results in more special elections, by an estimated \$10 million each special election. The state estimates additional costs of an unknown amount for its responsibilities related to a system of Online Accounts for Politically Active Citizens. Local entities estimate no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 3, 2023

OPINION LETTER NO. 202-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 23, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-076. The fiscal note summary that you submitted is as follows:

State costs could increase if this petition results in more special elections, by an estimated \$10 million each special election. The state estimates additional costs of an unknown amount for its responsibilities related to a system of Online Accounts for Politically Active Citizens. Local entities estimate no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 3, 2023

OPINION LETTER NO. 203-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated March 30, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Harry Cooper, 2024-070. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- limit each legislator to sixteen years' overall service in the legislature, rather than eight years in the house plus eight years in the senate, and lower the limit to twelve years if voters' direct legislative power is reduced relative to 2022;
- prohibit the legislature from changing any voter-initiated law without a referendum at the general election or three-quarters' consent in the house and senate, unless more than seven years have passed since voters approved the law; and
- prohibit the legislature from proposing any measure reducing the voters' direct legislative power?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 3, 2023

OPINION LETTER NO. 204-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 30, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Harry Cooper, 2024-071. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- replace legislators' term limit of eight years in the house plus eight years in the senate with a simplified term limit of sixteen years total in the legislature, so long as voters' direct legislative power is not reduced relative to 2022;
- prohibit the legislature from changing any voter-initiated law without a referendum at a general election or three-quarters' consent in the house and senate, unless more than seven years have passed since voters approved the law; and
- prohibit the legislature from proposing any measure reducing the voters' direct legislative power?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 205-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 29, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-074. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to allow a referendum to be ordered either by petitions signed by five percent of the legal voters in each of two-thirds of the congressional districts in the state or by a one-third vote of the members of either house of the general assembly, who may order a special election by a one-third vote in either house in a spate resolution related to the proposed amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY
April 10, 2023

OPINION LETTER NO. 206-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-077. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in Missouri, overturning dozens of existing state laws. The actual potential fiscal impact

likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true,

statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-205



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 207-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-078. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-206



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 208-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-079. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

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The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-207



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 209-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-080. The fiscal note summary that you submitted reads in its entirety as follows:

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This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

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Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

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—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

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Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

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The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-208



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 210-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-081. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-209



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 211-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-082. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.


Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-210



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 212-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-083. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

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The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-211



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 213-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-084. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-212



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 214-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-085. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-213



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 215-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-086. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-214



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 216-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Anna Fitz-James, 2024-087. The fiscal note summary that you submitted reads in its entirety as follows:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

This office has independently reviewed the submission your office received which was attached to the proposed fiscal note summary. Under § 116.175.4, RSMo, the Attorney General is tasked to review the "legal content and form of the fiscal note summary prepared by the state auditor[.]" Section 116.175.3 requires that the fiscal note and fiscal note summary "state the measure's estimated cost or savings, if any, to state and local governmental entities." If the Attorney General determines that "the fiscal note or the fiscal note summary summary does not satisfy the requirements of [§ 116.175, RSMo], the fiscal note and the fiscal note summary shall be returned to the auditor for revision." § 116.175.5, RSMo.

The Attorney General's Office is returning the fiscal note and fiscal note summary because the fiscal note summary does not contain the legal content required for Missourians to know the enormous financial impact this measure will have on the State of Missouri and its state and local governmental operations. If added to the Missouri Constitution, the measure would create a constitutional right abortion in

Missouri, overturning dozens of existing state laws. The actual potential fiscal impact likely is upward of \$12 billion—and potentially much higher based upon a study and report noted in conjunction with the Greene County submission discussed below. That impact is reflected in submissions from organizations and individuals who provided information to your office, yet it was not transposed into your fiscal note summary. In addition, because the impact to the State of Missouri is likely to be so drastic but is not reflected in the submissions you received from state and local entities, the fiscal note on which your summary relied is legally deficient.

A. The fiscal note is legally deficient.

- i. *The fiscal note contains inadequate and divergent submissions from local governmental entities.*

This ballot measure will affect the present and future population of Missouri. Yet while Missouri has 114 counties and one independent city, in addition to over 1,000 other cities and villages, your fiscal note requested submissions from just 12 counties and 14 cities. Only three counties and two cities responded. That is a statistically insignificant sample to be representative of the true fiscal impact.

One of those entities, Greene County, understood that the measure would have the obvious effect of reducing the population of their citizens. Greene County estimated that 135 future citizens would be lost in that county annually due to legalizing abortion in Missouri. Greene County's estimates were supported by fertility rates and the number of abortions in 2020 recorded by the Missouri Department of Health and Senior Services. Undoubtedly, this ballot measure will result in population loss. Greene County was the only entity to recognize what is facially apparent from this measure. It estimated nearly \$51,000 in lost revenue *annually* to that county based on the reduced population base. Moreover, this annual dollar amount will necessarily increase cumulatively in successive years.

Your office recognized that this was a reasonable assumption, as your fiscal note summary reflects the financial impact to Greene County. Your office, however, did not apply that same reasonable assumption when assessing the submissions from the few other entities who responded to your request for a fiscal note submission, nor did your office apply this obvious assumption to highly populous areas in the state.

—Greene County's assumption is supported by a nationwide study published by the United States Senate Joint Economic Committee. See <https://www.jec.senate.gov/public/index.cfm/republicans/2022/6/the-economic-cost-of-abortion>. It reports an estimate economic cost of abortion in 2019 alone, due to nearly 630,000 unborn lives – was at least \$6.9 trillion, or 32 percent of

the GDP. Based on this study and 4,660 abortions in Missouri in 2019,¹ the total economic loss to Missouri from these measures could be as high as \$51 billion. As Greene County appropriately presents, the substantial economic fiscal reality of abortion relating to unborn lives cannot be denied or omitted from a fiscal note to inform voters of the consequences.

In *Missouri Mun. League v. Carnahan*, 303 S.W.3d 573 (Mo. App. W.D. 2010) the Court of Appeals reviewed the State Auditor's Office's process in preparing a fiscal note and fiscal note summary for a ballot measure. The Court noted that it is your office's practice to "evaluate the responses and to obtain clarification from the entity if the information was unclear. If [the office] found a response to be unreasonable, that affected how much weight was given to the statement in preparing the summary." *Id.* at 582.

The fiscal note and fiscal note summary submitted to the Attorney General's Office does not comply with this process. Greene County's submission is the only reasonable submission by the few entities that responded to your request for submission. The responses from the other counties and cities were unreasonable as they employed an entirely different—and patently incorrect—methodology. It is unreasonable for those entities to conclude that the measure will have no estimated fiscal impact on their operations. Greene County's methodology, or a similar methodology that recognizes the assumptions Greene County recognizes, should be applied to the population base in all Missouri counties and take into account the number of reported abortions in Missouri from the Department of Health and Senior Services, a source referenced in Greene County's submission to your office.

- ii. *The fiscal note contains inadequate submissions concerning the impact to state governmental operations.*

The fiscal note indicates that responses were received from the Department of Revenue and the Department of Social Services, among others. Neither of those entities estimated a fiscal impact despite the plain impact this ballot measure will have to their agencies.

As Greene County recognized, aborting unborn Missourians will have a deleterious impact on the future tax base. The Department of Revenue did not employ a similar methodology for the state tax base. As one submission to your office noted, there were about 2,000 abortions reported in Missouri to the Department of Health and Senior Services between 2020-2021.

The Department of Revenue's submission should be rejected under *Carnahan*, which should affect "how much weight [should be] given to the statement in preparing the summary," *Missouri Mun. League*, 303 S.W.3d at 582. In the alternative, another

¹ <https://health.mo.gov/data/vitalstatistics/mvs19/Table12ab.pdf>.

submission should be requested from the Department of Revenue that more accurately estimates the fiscal impact to its operations.

The Department of Social Services similarly estimated that the measure will have no impact on their department. This submission also fails under *Carnahan*.

Your office received submissions that correctly indicate that this measure will affect the Department of Social Services. One submission noted that under federal law, “state are barred from using Federal funds to pay for abortions except in limited cases (the Hyde Amendment). Federal funding could be in jeopardy and Missouri could be subject to the risk of litigation and sanctions, including the possibility of deferral or disallowance of federal financial participation in Missouri’s Medicaid program.” As that submission noted, in 2019, Missouri’s Medicaid program received more than \$7.2 billion in federal funds.

Another submission noted the amendment might result in a loss of federal Medicaid revenues by an unknown amount, up to \$12.5 billion annually—the amount that Missouri is estimated to receive in fiscal year 2024 in federal Medicaid dollars. Other states have recently lost Medicaid revenue because of changes in abortion policy. As two submissions to your office noted, the State of California did not receive \$200 million in federal Medicaid matching dollars due to its unlawful abortion insurance mandate.

Those numbers are reflected nowhere in the submission from the Department of Social Services. The submission should thus be afforded no weight, or another submission should be requested from the Department of Social Services that more accurately estimates the fiscal impact to its operations.

B. The fiscal note summary is legally deficient

Under § 116.175.3, a fiscal note summary must contain “language neither argumentative nor likely to create prejudice either for or against the proposed measure.” It is subject to challenge in the courts if the language is “insufficient or unfair.” § 116.190.

The fiscal note summary likely does not comply with § 116.175 for at least two primary reasons. First, the fiscal note summary conveys the misleading message that it is an accurate representation of the true cost to local and state governmental operations. The only numerical figure mentioned in the fiscal note summary is \$51,000—a sliver of the maximum (or even likely) potential financial impact to local and state governmental operations. The average, reasonable voter reading this summary will not know the small sample of entities your office solicited for submissions or the small response rate. The fiscal note summary hides an elephant

in a mouse hole. Upon revision, if your office does not receive a greater response rate or solicit new submissions, the revised fiscal note should explain that the true, statewide cost of this measure is nowhere close to the amount reported by just one Missouri county.

Second, the fiscal note summary is legally deficient for failing to adequately summarize the submissions your office received. In *Protect Consumers' Access To Quality Home Care Coal., LLC v. Kander*, 488 S.W.3d 665 (Mo. App. W.D. 2015), the Court of Appeals held that "[t]he Auditor must include submissions in the fiscal note regarding the *potential* cost or savings to state or local government entities as a result of the initiative." *Id.* at 674. The fiscal note summary merely states that "opponents estimate a potentially significant loss to state revenue." Your office received submissions indicating that the "potentially significant loss" could be nearly \$12.5 billion dollars in Medicaid losses alone, and potentially much higher.

The fiscal note summary should reflect that number. To the extent that the fiscal note summary must have the "responses submitted [] listed verbatim in the fiscal note with only minor editing," *Brown v. Carnahan*, 370 S.W.3d 637, 649 (Mo. banc 2012), the fiscal note summary does not meet that standard by failing to note the potential \$12.5 billion impact to the State from the potential loss of Medicaid dollars or the much higher impact from the decrease in population.

Voters reading the fiscal note summary are likely to be misled into thinking that this ballot measure will have little fiscal impact on state and local governmental entities. If it ultimately appears as part of the official ballot title, the fiscal note summary is likely to be met with a well-founded legal challenge to its fairness and sufficiency.

For these reasons, I conclude that the fiscal note and fiscal note summary do not satisfy the requirements of § 116.175 and therefore I am returning them to you for revision.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-215



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 217-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-088. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 218-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-089. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 219-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-090. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 220-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-091. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 221-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-092. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 222-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-093. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 223-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-094. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 224-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-095. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 225-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of March 29, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Frederic Steinbach, 2024-096. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 226-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 29, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-101.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 227-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 29, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-102.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 228-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 29, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-103.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 10, 2023

OPINION LETTER NO. 229-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 29, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-104.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 13, 2023

OPINION LETTER NO. 230.2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated April 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-075. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow initiative petitions and referendums to be signed by one-third of the members in either chamber of the general assembly;
- allow submission of electronic statements of support for initiative petitions;
- invalidate signatures only if formal proof is offered and confirmed by the appropriate court;
- allow the legislature to call a special election for referendums and initiative petitions; and
- allow the governor to facilitate, establish and maintain online accounts for an electronic filing system of support statements for politically active citizens?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 13, 2023

OPINION LETTER NO. 231-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-076. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow initiative petitions and referendums to be signed by one-third of the members in either chamber of the general assembly;
- allow submission of electronic statements of support for initiative petitions;
- invalidate signatures only if formal proof is offered and confirmed by the appropriate court;
- allow the legislature to call a special election for referendums and initiative petitions; and
- allow the governor to facilitate, establish and maintain online accounts for an electronic filing system of support statements for politically active citizens?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 17, 2023

OPINION LETTER NO. 232-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of April 7, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Wisnton Apple, 2024-099. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 17, 2023

OPINION LETTER NO. 233-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of April 7, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Wisnton Apple, 2024-100. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 234-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-077. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including taxpayer funding; and
- prohibit any municipality, city, town, village, district, authority, public subdivision, or public corporation having the power to tax or regulate or the state of Missouri from regulating abortion procedures?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-235



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 235-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-078. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including taxpayer funding; and
- prohibit any municipality, city, town, village, district, authority, public subdivision, or public corporation having the power to tax or regulate or the state of Missouri from regulating abortion procedures?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-236



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 236-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-079. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including taxpayer funding; and
- prohibit any municipality, city, town, village, district, authority, public subdivision, or public corporation having the power to tax or regulate or the state of Missouri from regulating abortion procedures?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-237



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 237-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-080. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:


- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after 24 weeks, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-238



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 238-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-081. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after 24 weeks, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 239-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-082. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after 24 weeks, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 240-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-083. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:


- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after Fetal Viability, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-241



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 241-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-084. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:


- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after 24 weeks, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-242



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 242-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-085. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after Fetal Viability, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 243-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-086. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:


- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after Fetal Viability, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-244



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 244-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Anna Fitz-James, 2024-087. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for dangerous, unregulated, and unrestricted abortions, from conception to live birth, without requiring a medical license or potentially being subject to medical malpractice;
- nullify longstanding Missouri law protecting the right to life, including but not limited to partial-birth abortion;
- allow for laws to be enacted regulating abortion procedures after Fetal Viability, while guaranteeing the right of any woman, including a minor, to end the life of their unborn child at any time; and
- require the government not to discriminate against persons providing or obtaining an abortion, potentially including tax-payer funding?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. The summary is a concise statement, not exceeding one hundred words. It is in the form of a question using language that is neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. Because our review of the statement is mandated by statute, no action that we take with respect to such § 116.334, RSMo review of the above

proposed statement should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Finally, please note that our office has independently reviewed for legal content and form of the proposed fiscal note and fiscal note summary in accordance with § 116.175 RSMo. However, no such fiscal note summary in connection with this proposed measure has yet been approved by this Office.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 245-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-088. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 246-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-089. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 247-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-090. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 248-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-091. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 249-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-092. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure??

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 250-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-093. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 251-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-094. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 252-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-095. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 253-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Frederic Steinbach, 2024-096. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 254-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 14, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 213, Revised Statutes of Missouri, submitted by Madeline Smith, 2024-105.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 24, 2023

OPINION LETTER NO. 255-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 14, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, Revised Statutes of Missouri, submitted by Madeline Smith, 2024-106.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 256-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of April 18, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-101. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 257-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of April 18, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-102. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 258-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of April 18, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-103. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 259-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of April 18, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-104. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 260-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 18, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-107.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 261-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 18, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-108.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 262-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 18, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-109.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

April 28, 2023

OPINION LETTER NO. 263-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 18, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article VIII, of the Missouri Constitution submitted by David Brain, 2024-110.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 3, 2023

OPINION LETTER NO. 264-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated April 20, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-099. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow all consenting adults regardless of gender the right to marriage;
- allow parents or legal guardians to seek gender-affirming care or counseling with regard to gender identification and/or sexual orientation for minors;
- allow health care providers, ministers and clergy, and educators to provide counsel to minors seeking guidance and/or comfort with regard to matters relating to gender identification and sexual orientation; and
- allow the freedom to express and act upon individual sexual orientation so long as these rights does not infringe upon the rights to do the same?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 3, 2023

OPINION LETTER NO. 265-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 20, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-100. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- elect the governor, lieutenant governor, secretary of state, treasurer, attorney general and auditor by the General Assembly;
- allow an election to be called separately at any time by a majority of members of either chamber;
- allow any member of the General Assembly to nominate candidates;
- provide if more than two candidates are nominated for an office, the election shall be conducted using ranked choice voting and members of the General Assembly shall rank by order of preference; and
- allow any candidate who receives a majority of votes to be elected?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 11, 2023

OPINION LETTER NO. 266-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated May 1, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-101. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 11, 2023

OPINION LETTER NO. 267-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 1, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-102. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 11, 2023

OPINION LETTER NO. 268-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 1, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-103. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 11, 2023

OPINION LETTER NO. 269-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 1, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-104. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Federal government to control how voter rolls are updated;
- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 15, 2023

OPINION LETTER NO. 270-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of May 4, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Madeline Smith, 2024-105. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$2,800 and ongoing costs of at least \$65,000 annually. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-272



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 15, 2023

OPINION LETTER NO. 271-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of May 4, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Madeline Smith, 2024-106. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings for this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-273



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 15, 2023

OPINION LETTER NO. 272-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of May 5, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-107. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings. Local governmental entities estimate one-time costs of at least \$95,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-274



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 15, 2023

OPINION LETTER NO. 273-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of May 5, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-108. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings. Local governmental entities estimate one-time costs of at least \$95,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-275



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 15, 2023

OPINION LETTER NO. 274-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of May 5, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-109. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings. Local governmental entities estimate one-time costs of at least \$95,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-276



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 15, 2023

OPINION LETTER NO. 275-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of May 5, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by David Brain, 2024-110. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no costs or savings. Local governmental entities estimate one-time costs of at least \$95,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-277



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 25, 2023

OPINION LETTER NO. 276-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 15, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XIV, of the Missouri Constitution submitted by Mark Pedersen, 2024-112.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 25, 2023

OPINION LETTER NO. 277-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 16, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Madeline Smith, 2024-105. The proposed summary statement is as follows:

Do you want to amend the Missouri Commission on Human Rights laws to expand the commonly understood definition for the word sex to include sexual orientation and gender identity?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 25, 2023

OPINION LETTER NO. 278-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 16, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Madeline Smith, 2024-106. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to repeal Article I, Section 33 of the constitution which would remove from the constitution that in the state of Missouri a marriage shall only exist between a man and a woman?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 30, 2023

OPINION LETTER NO. 279-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-107. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 30, 2023

OPINION LETTER NO. 280-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-108. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 30, 2023

OPINION LETTER NO. 281-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated May 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-109. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

May 30, 2023

OPINION LETTER NO. 282-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated May 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by David Brain, 2024-110. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- direct voters to choose all candidates they like in each race for primary, special and general elections without assigning any order preference;
- require candidates with the highest number of votes to be declared the winner;
- guarantee all established political parties the right to have their designated nominees appear on the general election ballot; and
- require ballot titles proposed by the General Assembly, or through the citizen initiative or referendum to only include language found in the proposed measure?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

June 12, 2023

OPINION LETTER NO. 283-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of June 2, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Mark Pedersen, 2024-112. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$260 million and annual lost revenue of at least \$277.3 million. Businesses could annually pay an additional \$1 billion in federal unemployment taxes causing an unknown negative impact on the state's economy. Local governments are estimated to have annual lost revenue of at least \$40.9 million.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-285



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

June 27, 2023

OPINION LETTER NO. 284-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated June 15, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Mark Pedersen, 2024-112. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- remove marijuana from the list of controlled substances and consider it a food not a drug;
- remove all marijuana government oversight and regulations;
- remove special taxes and reporting on all marijuana consumption, purchases or sales;
- eliminate special zoning requirements for marijuana farmers, manufacturers, processors and distributors; eliminate restrictions on all commercial marijuana regulations and oversight;
- allow for personal marijuana cultivation for family, friends or neighbors to grow and share;
- eliminate any restriction on where marijuana can be consumed; and
- eliminate the age requirements for marijuana usage?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 6, 2023

OPINION LETTER NO. 285-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of June 21, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for Senate Joint Resolution No. 26. The fiscal note summary that you submitted is as follows:

State governmental entities estimate the state's Blind Pension Fund could have annual lost revenue of up to \$400,000. Local governments expect an unknown fiscal impact.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 6, 2023

OPINION LETTER NO. 286-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 23, 2023, for our review under § 116.025, RSMo, of a proposed fair ballot language for Senate Joint Resolution No. 26. The proposed fair ballot language statement is as follows:

A "yes" vote will amend the Missouri Constitution to grant the General Assembly statutory authority to exempt all property, real and personal, used primarily for the care of a child outside of his or her home by general law. An assessing authority may be authorized by general law to exempt from the assessment, levy, and collection of taxes such portion of the property of such individual, corporation, organization, or association that is used primarily for such childcare.

A "no" vote will not amend the Missouri Constitution and childcare facilities will continue to be assessed, levied, and pay taxes.

If passed, this measure will have no impact on taxes.

Pursuant to § 116.025, RSMo, we approve the legal content and form of the proposed fair ballot language statement.

Because our review of the fair ballot language statement is mandated by statute, no action we take with respect to such review should be construed as an endorsement of the initiative petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

Broadway Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2023-288



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 7, 2023

OPINION LETTER NO. 287-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 27, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 324, Revised Statutes of Missouri, submitted by Bradley Ketcher, 2024-113.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-289



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 7, 2023

OPINION LETTER NO. 288-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 28, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jimmie Edwards, 2024-114.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-290



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 7, 2023

OPINION LETTER NO. 289-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 28, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jimmie Edwards, 2024-115.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-291

July 7, 2023

OPINION LETTER NO. 290-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jimmie Edwards, 2024-117.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 17, 2023

OPINION LETTER NO. 291-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated July 7, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Paul Berry III, Article I, 2024-118.

We conclude that the petition must be rejected for at least the following reasons:

is not in the form required under 116.040, 116.050, and 116.060, RSMo.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and "make a final decision as to the approval or rejection of the form of the petition."

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 292-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-077 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 293-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-078 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 294-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-079 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-207



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 295-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-080 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 296-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-081 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-209

ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 297-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-082 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-210



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 298-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-083 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-211



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 299-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-084 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-212



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 300-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-085 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-213



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 301-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-086 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-214



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 20, 2023

OPINION LETTER NO. 302-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

Your office previously prepared the following fiscal note summary for Initiative Petition 2024-087 proposed by Anna Fitz-James:

State governmental entities estimate no costs or savings, but unknown impact. Local governmental entities estimate costs of at least \$51,000 annually in reduced tax revenues. Opponents estimate a potentially significant loss to state revenue.

On July 20, 2023, the Supreme Court of Missouri issued its opinion in *State ex rel. Fitz-James v. Bailey* (Case No. SC100132) holding that this fiscal note summary contains the information required by Section 116.175.3, RSMo, and mandating that the Attorney General send a letter to your office consistent with its opinion. Pursuant to the Court's opinion, please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 27, 2023

OPINION LETTER NO. 303-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of July 17, 2023,, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Bradley Ketcher, 2024-113. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 28, 2023

OPINION LETTER NO. 304-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101


Dear Auditor Fitzpatrick:

This office received your letter of July 18, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jimmie Edwards, 2024-114. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased litigation costs of up to \$7.5 million. Other state and local governmental entities estimate no costs or savings.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 28, 2023

OPINION LETTER NO. 305-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of July 18, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jimmie Edwards, 2024-115. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased litigation costs of up to \$7.5 million. Other state and local governmental entities estimate no costs or savings.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 28, 2023

OPINION LETTER NO. 306-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of July 20, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jimmie Edwards, 2024-117. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased litigation costs of up to \$7.5 million. Other state and local governmental entities estimate no costs or savings.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

July 31, 2023

OPINION LETTER NO. 307-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated July 21, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Paul Berry III, 2024-119.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 7, 2023

OPINION LETTER NO. 308-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated July 27, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Byron Keelin, Article I, 2024-120.

We conclude that the petition must be rejected for at least the following reasons:

Failure to follow the requirement for including the full and correct text of the measure contained in Section 116.050.2(1), RSMo.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-300



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 7, 2023

OPINION LETTER NO. 309-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

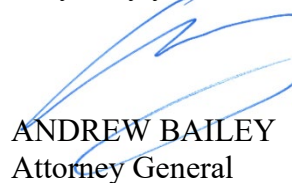
This opinion letter responds to your request dated July 27, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Theo Brown Sr., Chapter 71, 2024-121.

We conclude that the petition must be rejected for at least the following reasons:

Failure to follow the requirement for including the full and correct text of the measure contained in Section 116.050.2(1), RSMo.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-301



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 7, 2023

OPINION LETTER NO. 310-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated July 28, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Bradley Ketcher, 2024-113. The proposed summary statement is as follows:

Do you want to amend Missouri law to allow voters the right and option to vote to set local transaction taxes related to massage therapists and massage businesses?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-302



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 7, 2023

OPINION LETTER NO. 311-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated July 31, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Paul Berry III, Article IX, 2024-122.

We conclude that the petition must be rejected for at least the following reasons:

Failure to follow the requirement for including the full and correct text of the measure contained in Section 116.050.2(1), RSMo.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-303



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 14, 2023

OPINION LETTER NO. 312-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated August 2, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jimmie Edwards, 2024-114. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- authorize for the regulation by ordinance of the possession, carrying or transfer of firearms, to apply to all individuals while within Jackson and St. Louis counties and the cities of Kansas City and St. Louis with exemptions;
- authorize St. Louis and Kansas City areas to pass ordinances which could supersede the Second Amendment Preservation Act;
- authorize ordinances which allow for the seizure of firearms by law enforcement under certain circumstances; and
- allow for a fee to cover the cost for the issuance of permits or certificates?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-304



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 14, 2023

OPINION LETTER NO. 313-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated August 2, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jimmie Edwards, 2024-115. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- authorize for the regulation by ordinance of the possession, carrying or transfer of firearms, to apply to any individual within any county and cities of Kansas City and St. Louis with exemptions;
- authorize any county and cities of St. Louis and Kansas City to pass ordinances which could supersede the Second Amendment Preservation Act;
- require a referendum vote of any ordinance except in Jackson and St. Louis counties and cities; and
- authorize ordinances which allow for the seizure of firearms by law enforcement under certain circumstances?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-305



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 14, 2023

OPINION LETTER NO. 314-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated August 2, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jimmie Edwards, 2024-117. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- authorize for the regulation by ordinance of the possession or carrying of firearms, to apply to any individual within any county and cities of Kansas City and St. Louis with exemptions;
- authorize any county and cities of St. Louis and Kansas City to pass ordinances which could supersede the Second Amendment Preservation Act;
- authorize ordinances which allow for the seizure of firearms by law enforcement under certain circumstances; and
- allow for a fee to cover the cost for the issuance of permits or certificates?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-306



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

August 15, 2023

OPINION LETTER NO. 315-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Byron Keelin, 2024-123.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 18, 2023

OPINION LETTER NO. 316-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 8, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XIII, of the Missouri Constitution submitted by Alixandra Cossette, 2024-124.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 18, 2023

OPINION LETTER NO. 317-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 8, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XIII, of the Missouri Constitution submitted by Alixandra Cossette, 2024-125.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 18, 2023

OPINION LETTER NO. 318-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 8, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XIII, of the Missouri Constitution submitted by Alixandra Cossette, 2024-126.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 18, 2023

OPINION LETTER NO. 319-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 8, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XIII, of the Missouri Constitution submitted by Alixandra Cossette, 2024-127.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 21, 2023

OPINION LETTER NO. 320-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of August 10, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Paul Berry III, 2024-119. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

August 24, 2023

OPINION LETTER NO. 321-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 14, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article IX, of the Missouri Constitution submitted by Paul Berry III, 2024-128.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 5, 2023

OPINION LETTER NO. 322-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated August 23, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Paul Berry III, 2024-119. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- prohibit any municipality, county or subdivision of the state from passing any rule, regulation, ordinance, or law that would regulate the right of any citizen to keep and bear arms, ammunition, and accessories typical to the normal function of such arms; and
- prohibit any person under the age of 18 from possessing any firearm within the state, unless such possession is under emergency circumstances, by a member of the United States Armed Forces, with permission of a parent/guardian, or under the direct supervision of a person over the age of 25?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 5, 2023

OPINION LETTER NO. 323-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of August 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Byron Keelin, 2024-123. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-315



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

September 7, 2023

OPINION LETTER NO. 324-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of August 28, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-124. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 7, 2023

OPINION LETTER NO. 325-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of August 28, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-125. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 7, 2023

OPINION LETTER NO. 326-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of August 28, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-126. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 7, 2023

OPINION LETTER NO. 327-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of August 28, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-127. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 328-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jamie Corley, 2024-129.

Please consider this correspondence to be the required notice of the Attorney General under § 116.332.3. This Office did not identify a basis to reject the measure as to form under the relevant provisions of Chapter 116, RSMo. Section 116.332 gives the Secretary of State to review the measure and make the final decision to approve or reject the petition as to form. Therefore, this Office's letter does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-320



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 329-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jamie Corley, 2024-130.

Please consider this correspondence to be the required notice of the Attorney General under § 116.332.3. This Office did not identify a basis to reject the measure as to form under the relevant provisions of Chapter 116, RSMo. Section 116.332 gives the Secretary of State to review the measure and make the final decision to approve or reject the petition as to form. Therefore, this Office's letter does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-321



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 330-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jamie Corley, 2024-131.

Please consider this correspondence to be the required notice of the Attorney General under § 116.332.3. This Office did not identify a basis to reject the measure as to form under the relevant provisions of Chapter 116, RSMo. Section 116.332 gives the Secretary of State to review the measure and make the final decision to approve or reject the petition as to form. Therefore, this Office's letter does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-322



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 331-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jamie Corley, 2024-132.

Please consider this correspondence to be the required notice of the Attorney General under § 116.332.3. This Office did not identify a basis to reject the measure as to form under the relevant provisions of Chapter 116, RSMo. Section 116.332 gives the Secretary of State to review the measure and make the final decision to approve or reject the petition as to form. Therefore, this Office's letter does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-323



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 332-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jamie Corley, 2024-133.

Please consider this correspondence to be the required notice of the Attorney General under § 116.332.3. This Office did not identify a basis to reject the measure as to form under the relevant provisions of Chapter 116, RSMo. Section 116.332 gives the Secretary of State to review the measure and make the final decision to approve or reject the petition as to form. Therefore, this Office's letter does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-324



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 333-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated August 30, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Jamie Corley, 2024-134.

Please consider this correspondence to be the required notice of the Attorney General under § 116.332.3. This Office did not identify a basis to reject the measure as to form under the relevant provisions of Chapter 116, RSMo. Section 116.332 gives the Secretary of State to review the measure and make the final decision to approve or reject the petition as to form. Therefore, this Office's letter does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-325



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 11, 2023

OPINION LETTER NO. 334-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 1, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Paul Berry III, 2024-128. The fiscal note summary that you submitted is as follows:

State governmental entities expect increased costs of \$846,000 in the first year of implementation and annual costs thereafter of at least \$491,000. Public school districts expect an unknown fiscal impact that could significantly negative for any district that experiences a large decrease in enrollment.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-326



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 18, 2023

OPINION LETTER NO. 335-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated September 7, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Byron Keelin, 2024-123. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- guarantee the right of any individual to informed consent which includes the right to be informed about exposure to mRNA and/or gene-altering therapies and medical technologies or treatment;
- guarantee the right to refuse any medical technologies, procedures, or treatments, including, but not limited to injections, vaccines, or prophylactics;
- potentially allow or prohibit abortion without consent of an unborn child; and
- prohibit any law, rule, order, ordinance, or regulation to require, mandate, or coerce any person to receive or use a medical procedure, treatment, vaccine, prophylactic, pharmaceutical or medical device?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-327



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 18, 2023

OPINION LETTER NO. 336-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated September 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-124. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution:

- require constitutional amendments to be voted only on November even-numbered year general elections;
- allow U.S. citizens to act as petition circulators; and
- allow constitutional amendments that have been certified and approved for circulation to be signed by registered voters attaching the ballot title language for use at the time, or for those without a certified ballot title required by law, the circulator may attach the full petition language and registered voter's signatures may be collected?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-328



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 18, 2023

OPINION LETTER NO. 337-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated September 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-125. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution:

- require constitutional amendments to be voted only on November even-numbered year general elections;
- allow U.S. citizens to act as petition circulators; and
- allow constitutional amendments that have been certified and approved for circulation to be signed by registered voters attaching the ballot title language for use at the time, or for those without a certified ballot title required by law, the circulator may attach the full petition language and registered voter's signatures may be collected?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-329



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 18, 2023

OPINION LETTER NO. 338-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated September 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-126. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution:

- require constitutional amendments to be voted only on November even-numbered year general elections;
- allow U.S. citizens to act as petition circulators; and
- allow constitutional amendments that have been certified and approved for circulation to be signed by registered voters attaching the ballot title language for use at the time, or for those without a certified ballot title required by law, the circulator may attach the full petition language and registered voter's signatures may be collected?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-330



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 18, 2023

OPINION LETTER NO. 339-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated September 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-127. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution:

- require constitutional amendments to be voted only on November even-numbered year general elections;
- allow U.S. citizens to act as petition circulators; and
- allow constitutional amendments that have been certified and approved for circulation to be signed by registered voters attaching the ballot title language for use at the time, or for those without a certified ballot title required by law, the circulator may attach the full petition language and registered voter's signatures may be collected?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-331



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 20, 2023

OPINION LETTER NO. 340-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-135.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 20, 2023

OPINION LETTER NO. 341-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-136.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 20, 2023

OPINION LETTER NO. 342-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-137.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 20, 2023

OPINION LETTER NO. 343-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-138.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 344-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Greta Bax, 2024-139.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-336



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 345-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Greta Bax, 2024-140.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-337



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 346-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Greta Bax, 2024-141.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-338



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 347-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Greta Bax, 2024-142.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-339



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 348-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Greta Bax, 2024-143.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-340



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 349-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated September 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Greta Bax, 2024-144.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-341



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 25, 2023

OPINION LETTER NO. 350-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated September 15, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Paul Berry III, 2024-128. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow any character, private or public school to accept transfer students with an establishment process;
- allow any K-12 student in the state to attend any charter, private or public school outside of the district of their home residence who meet certain academic, attendance and disciplinary requirements;
- allow for acceptance criteria by the receiving school for grades K-5 and grades 6-12; and
- allow the attendance transfer school district to receive the sum amount of the per pupil expenditure that would otherwise be allocated by the home district?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 29, 2023

OPINION LETTER NO. 351-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 19, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-129. The fiscal note summary that you submitted is as follows:

The Attorney General's office and opponents estimate a potentially significant loss to state and local revenue. The Attorney General's office estimates increased state litigation costs of up to \$21 million. Other state governmental entities estimate no costs or savings. Local governments estimate reduced revenue of at least \$51,000 annually.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed fiscal note summary. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 29, 2023

OPINION LETTER NO. 352-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 19, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-130. The fiscal note summary that you submitted is as follows:

The Attorney General's office and opponents estimate a potentially significant loss to state and local revenue. The Attorney General's office estimates increased state litigation costs of up to \$21 million. Other state governmental entities estimate no costs or savings. Local governments estimate reduced revenue of at least \$51,000 annually.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed fiscal note summary. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 29, 2023

OPINION LETTER NO. 353-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 19, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-131. The fiscal note summary that you submitted is as follows:

The Attorney General's office and opponents estimate a potentially significant loss to state and local revenue. The Attorney General's office estimates increased state litigation costs of up to \$21 million. Other state governmental entities estimate no costs or savings. Local governments estimate reduced revenue of at least \$51,000 annually.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed fiscal note summary. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 29, 2023

OPINION LETTER NO. 354-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 19, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-132. The fiscal note summary that you submitted is as follows:

The Attorney General's office and opponents estimate a potentially significant loss to state and local revenue. The Attorney General's office estimates increased state litigation costs of up to \$21 million. Other state governmental entities estimate no costs or savings. Local governments estimate reduced revenue of at least \$51,000 annually.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed fiscal note summary. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 29, 2023

OPINION LETTER NO. 355-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 19, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-133. The fiscal note summary that you submitted is as follows:

The Attorney General's office and opponents estimate a potentially significant loss to state and local revenue. The Attorney General's office estimates increased state litigation costs of up to \$21 million. Other state governmental entities estimate no costs or savings. Local governments estimate reduced revenue of at least \$51,000 annually.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed fiscal note summary. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

September 29, 2023

OPINION LETTER NO. 356-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 19, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-134. The fiscal note summary that you submitted is as follows:

The Attorney General's office and opponents estimate a potentially significant loss to state and local revenue. The Attorney General's office estimates increased state litigation costs of up to \$21 million. Other state governmental entities estimate no costs or savings. Local governments estimate reduced revenue of at least \$51,000 annually.

Please consider this letter to constitute the notice required of the Missouri Attorney General under Section 116.175.4, RSMo, as to the legal content and form of the proposed fiscal note summary. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 357-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-135. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$326,000, ongoing costs of \$4.4 million annually, initial license fee revenue of \$6.75 million, and ongoing annual tax revenue ranging from \$6.4 million to \$26.7 million by the fourth year of implementation. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 358-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-136. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$326,000, ongoing costs of \$4.4 million annually, initial license fee revenue of \$6.25 million, and ongoing annual tax revenue ranging from \$6.4 million to \$26.7 million by the fourth year of implementation. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 359-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-137. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$326,000, ongoing costs of \$4.4 million annually, initial license fee revenue of \$5.75 million, and ongoing annual tax revenue ranging from \$6.4 million to \$26.7 million by the fourth year of implementation. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 360-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of September 29, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Jamie Corley, 2024-138. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$326,000, ongoing costs of \$4.4 million annually, initial license fee revenue of \$10.75 million, and ongoing annual tax revenue ranging from \$6.4 million to \$26.7 million by the fourth year of implementation. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 361-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 3, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-139. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased legal costs of at least \$9 million. Other state governmental entities estimate costs of at least \$19,000 beginning in the first full year of implementation and annual revenue of \$629,000. Local governmental entities estimate annual revenue of at least \$150,000 and annual costs of at least \$60,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-353



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 362-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 3, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-140. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased legal costs of at least \$9 million. Other state governmental entities estimate annual costs of at least \$103,000 by fiscal year 2029. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-354



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 363-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 3, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-141. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased legal costs of at least \$9 million. Other state governmental entities estimate costs of at least \$19,000 beginning in the first full year of implementation and annual revenue of \$629,000. Local governmental entities estimate annual revenue of at least \$150,000 and annual costs of at least \$60,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-355



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 364-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 3, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-142. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased legal costs of at least \$9 million. Other state governmental entities estimate costs of at least \$19,000 beginning in the first full year of implementation and annual revenue of \$629,000. Local governmental entities estimate annual revenue of at least \$150,000 and annual costs of at least \$60,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-356



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 365-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 3, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-143. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased legal costs of at least \$9 million. Other state entities estimate a cost of \$81,000 for required computer system updates. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-357



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 10, 2023

OPINION LETTER NO. 366-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 3, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-144. The fiscal note summary that you submitted is as follows:

The Attorney General estimates increased legal costs of at least \$9 million. Other state entities estimate annual costs of at least \$20,000 by fiscal year 2027. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-358



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 367-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101


Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 3, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article I, of the Missouri Constitution submitted by Byron Keelin, 2024-145.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 368-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-146.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-360



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 369-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-147.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-361



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 370-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-148.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-362



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 371-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-149.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-363



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 372-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-150.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-364



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 373-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-151.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-365



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 374-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-152.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-366



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 375-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-153.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-367



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 376-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-154.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-368



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 377-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-155.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-369



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 378-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-156.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-370



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 379-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-157.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-371



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 380-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-158.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-372



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 381-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-159.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-373



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 382-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-160.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-374



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 383-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Alixandra Cossette, 2024-161.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-375



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 384-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jamie Corley, 2024-129. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- nullify Missouri laws protecting the right to life, which conflict with these constitutional changes;
- allow abortions at any age without government interference from conception to live birth in the case of rape or sexual assault, incest, fatal fetal abnormality or risk to the health/safety of the mother;
- prohibit abortions regarding an alleged rape or sexual assault unless reported to a specific crisis hotline; and
- limit criminal prosecution or civil penalty of any person who performs, assists or provides support to induce, seek or obtain an abortion in any state?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-376



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 385-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jamie Corley, 2024-130. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- nullify Missouri laws protecting the right to life, which conflict with these constitutional changes;
- allow abortions up to a fetal gestational age of twelve weeks without government interference in the case of rape or sexual assault, incest, fatal fetal abnormality or risk to the health/safety of the mother;
- prohibit abortions regarding an alleged rape or sexual assault unless reported to a specific crisis hotline; and
- limit criminal prosecution or civil penalty of any person who performs, assists or provides support to induce, seek or obtain an abortion in any state?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-377



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 386-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jamie Corley, 2024-131. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- nullify Missouri laws protecting the right to life, which conflict with these constitutional changes;
- allow abortions at any age without government interference from conception to live birth in the case of rape or sexual assault with reporting requirements, incest, fatal fetal abnormality or risk to the health/safety of the mother;
- limit the general assembly's authority from refusing to appropriate funds to abortion providers; and
- limit criminal prosecution or civil penalty of any person who performs, assists or provides support to induce, seek or obtain an abortion in any state?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-378



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 387-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jamie Corley, 2024-132. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow no-excuse abortions through gestational age of twelve weeks;
- change Missouri laws regarding the right to life;
- allow abortions at any age without government interference from conception to live birth in the case of rape or sexual assault with reporting requirements, incest, fatal fetal abnormality or risk to the health/safety of the mother;
- limit the general assembly's authority from refusing to appropriate funds to abortion providers; and
- limit criminal prosecution/civil penalty of any person who performs, assists or provides support to induce, seek or obtain an abortion in any state?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 388-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jamie Corley, 2024-133. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- nullify Missouri laws protecting the right to life, which conflict with these constitutional changes;
- allow abortions at any age without government interference before fetal viability in the case of rape or sexual assault with reporting requirements, incest, fatal fetal abnormality or risk to the health/safety of the mother;
- limit the general assembly's authority from refusing to appropriate funds to abortion providers; and
- limit criminal prosecution or civil penalty of any person who performs, assists or provides support to induce, seek or obtain an abortion in any state?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-380



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 16, 2023

OPINION LETTER NO. 389-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 4, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Jamie Corley, 2024-134. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow no-excuse abortions through gestational age of twelve weeks;
- change Missouri laws regarding the right to life;
- allow abortions at any age without government interference before fetal viability in the case of rape or sexual assault with reporting requirements, incest, fatal fetal abnormality or risk to the health/safety of the mother;
- limit the general assembly's authority from refusing to appropriate funds to abortion providers; and
- limit criminal prosecution/civil penalty of any person who performs, assists or provides support to induce, seek or obtain an abortion in any state?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 390-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Greta Bax, 2024-162.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-382



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 391-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Greta Bax, 2024-163.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-383



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 392-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Greta Bax, 2024-164.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-384



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 393-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 11, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article III, of the Missouri Constitution submitted by Greta Bax, 2024-165.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-385



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 394-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-135. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow regulated sports wagering to entities licensed by the Missouri Gaming Commission including mobile licenses to sports wagering operators;
- restrict sports wagering to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a wagering tax of 10% on revenue received to be appropriated for education after expenses incurred by the Commission and five million in total assets to the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with the amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-386



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 395-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-136. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow regulated sports wagering to entities licensed by the Missouri Gaming Commission including mobile licenses to sports wagering operators;
- restrict sports wagering to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a wagering tax of 10% on revenue received to be appropriated for education after expenses incurred by the Commission and five million in total assets to the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with the amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-387



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 396-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-137. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow regulated sports wagering to entities licensed by the Missouri Gaming Commission including mobile licenses to sports wagering operators;
- restrict sports wagering to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a wagering tax of 10% on revenue received to be appropriated for education after expenses incurred by the Commission and five million in total assets to the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with the amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-388



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 23, 2023

OPINION LETTER NO. 397-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 13, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-138. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow regulated sports wagering to entities licensed by the Missouri Gaming Commission including mobile licenses to sports wagering operators;
- restrict sports wagering to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a wagering tax of 10% on revenue received to be appropriated for education after expenses incurred by the Commission and five million in total assets to the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with the amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-389



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 26, 2023

OPINION LETTER NO. 398-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 16, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by JoAnn Franklin, 2024-166.

We conclude that the petition must be rejected for at least the following reasons:

- Failure to comply with Article III, Section 50 of the Missouri Constitution, including, but not necessarily limited to, the absence of the required enacting clause; and
- Failure to comply with Section 116.050, RSMo, including, but not necessarily limited to, the requirement to contain “all matter which is to be deleted included in its proper place enclosed in brackets and all new matter shown underlined.”

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 30, 2023

OPINION LETTER NO. 399-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-139. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- remove a person's current statutory right to conceal and carry a firearm without a permit;
- make it a class E Felony for any person who conceals and carries a firearm without a permit from the county sheriff where they reside;
- require applicants to pass a background check and meet permitting requirements that exist in law on January 1, 2023; and
- allow sheriffs to charge a permit fee up to one hundred dollars?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-391



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 30, 2023

OPINION LETTER NO. 400-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-140. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- overrule a law-abiding citizen's current statutory right to sell a firearm and the people's right to keep and bear arms;
- prohibit any person from selling a firearm to another person, including at gun shows and private sales, unless a licensed firearms dealer first conducts a background check with both the buyer and seller present; and
- penalize any person who violates this process starting with a class A misdemeanor for the first violation, class E felony for second violation and class D felony for third and subsequent violations?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 30, 2023

OPINION LETTER NO. 401-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-141. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- remove a person's current statutory right to conceal and carry a firearm without a permit;
- make it a class E Felony for any person who conceals and carries a firearm without a permit from the county sheriff where they reside;
- require all applicants to pass a background check, be at least eighteen years of age and complete firearms safety training;
- require persons to carry the permit and if not, may be issued a citation up to fifty dollars; and
- allow sheriffs to charge a permit fee up to one hundred dollars?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-393



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 30, 2023

OPINION LETTER NO. 402-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-142. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- remove a person's current statutory right to conceal and carry a firearm without a permit;
- make it a class E Felony for any person who conceals and carries a firearm without a permit issued from the county sheriff where they reside;
- require all applicants to pass a background check and be at least eighteen years of age; and
- allow sheriffs to charge a permit fee up to one hundred dollars?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-394



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 30, 2023

OPINION LETTER NO. 403-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated October 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-143. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the state to prohibit persons from possessing, using, purchasing, manufacturing or otherwise receiving a firearm without due process;
- allow a court petition to be filed with a sworn statement or affidavit providing specific facts forming the basis of allegations for issuance of a protection order due to the extreme risk of the person causing personal injury or death to himself/herself or another person; and
- allow the petition to be filed by specific family members, law enforcement or a designee, city or county attorney, mental health professionals or school officials?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

October 30, 2023

OPINION LETTER NO. 404-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 18, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-144. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- prohibit any person from knowingly selling a firearm to a person under eighteen years of age; and
- penalize any person who violates this provision to be guilty of a class E felony?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 2, 2023

OPINION LETTER NO. 405-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 23, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Byron Keelin, 2024-145. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-397



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 406-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-154. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$12.25 million. Because the proposal allows for deductions against sp01is gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-398



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 407-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-155. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$10.75 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-399



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 408-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-156. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$12.75 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-400



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 409-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-157. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$10.75 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-401



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 410-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-158. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$12.25 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-402



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 411-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-159. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$12.75 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-403



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 412-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-160. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$11.75 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-404



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 3, 2023

OPINION LETTER NO. 413-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 24, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Alixandra Cossette, 2024-161. The fiscal note summary that you submitted is as follows:

State governmental entities estimate onetime costs of \$660,000, ongoing annual costs of at least \$5.2 million, and initial license fee revenue of \$11.75 million. Because the proposal allows for deductions against sports gaming revenues, they estimate unknown tax revenue ranging from \$0 to \$28.9 million annually. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-405



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 7, 2023

OPINION LETTER NO. 414-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated October 27, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by JoAnn Franklin, Article XV, 2024-167.

We conclude that the petition must be rejected for at least the following reasons:

Failure to comply with Section 116.040 because the required information in that statute is not “substantially the same form of each page” of the initiative petition submission, in that the circulator’s affidavit along with the notarization affirmation were submitted on more than one page.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-406



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 13, 2023

OPINION LETTER NO. 415-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 31, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-162. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$763,000, ongoing costs of \$2.2 million annually, initial fee revenue of \$271,000, ongoing admission and other fee revenue of \$2.1 million annually, and annual gaming tax revenue of \$14.3 million. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-407



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 13, 2023

OPINION LETTER NO. 416-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 31, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-163. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$763,000, ongoing costs of \$2.2 million annually, initial fee revenue of \$271,000, ongoing admission and other fee revenue of \$2.1 million annually, and annual gaming tax revenue of \$14.3 million. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-408



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 13, 2023

OPINION LETTER NO. 417-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 31, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-164. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$763,000, ongoing costs of \$2.2 million annually, initial fee revenue of \$271,000, ongoing admission and other fee revenue of \$2.1 million annually, and annual gaming tax revenue of \$14.3 million. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-409



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 13, 2023

OPINION LETTER NO. 418-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of October 31, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Greta Bax, 2024-165. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of \$763,000, ongoing costs of \$2.2 million annually, initial fee revenue of \$271,000, ongoing admission and other fee revenue of \$2.1 million annually, and annual gaming tax revenue of \$14.3 million. Local governments estimate unknown revenue.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-410



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 13, 2023

OPINION LETTER NO. 419-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated November 2, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Byron Keelin, 2024-145. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- guarantee the right of any individual to refuse interventions upon any person and freedom from state government or any state political subdivision interference regardless if unlawful;
- guarantee the right to informed consent when promoting any medical intervention which includes information about exposure to mRNA and/or gene-altering therapies, medical technologies or treatment; and
- prohibit any law, order, ordinance, regulation or public policy that mandates, coerces or infringes on any individual's right to refuse any medical treatment, technology, testing, facial coverings, medical devices and/or procedures including but not limited to injections and vaccines?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-411



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 420-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-154. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 421-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-155. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 422-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-156. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 423-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-157. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 424-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-158. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 425-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-159. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 426-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-160. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 20, 2023

OPINION LETTER NO. 427-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 8, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Alixandra Cossette, 2024-161. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to regulate licensed sports wagering including online sports betting, gambling boats, professional sports betting districts and mobile licenses to sports betting operators;
- restrict sports betting to individuals physically located in the state and over the age of 21;
- allow license fees prescribed by the Commission and a 10% wagering tax on revenues received to be appropriated for education after expenses incurred by the Commission and required funding of the Compulsive Gambling Prevention Fund; and
- allow for the general assembly to enact laws consistent with this amendment?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 428-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 13, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XV, of the Missouri Constitution submitted by JoAnn Franklin, 2024-168.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-420



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 429-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 14, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XV, of the Missouri Constitution submitted by Deidre Hirner, 2024-169.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-421



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 430-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 14, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article XV, of the Missouri Constitution submitted by Deidre Hirner, 2024-170.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-422



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 431-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated November 15, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-162. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to issue one additional gambling boat license to operate on the portion of the Osage River from the Missouri River to the Bagnell Dam;
- require the prescribed location shall include artificial spaces that contain water and are within 500 feet of the 100-year base flood elevation as established by the Federal Emergency Management Agency; and
- require all state revenues derived from the issuance of the gambling boat license shall be appropriated to the STEM Career Awareness Program Fund, or its successor fund?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-423



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 432-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 15, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-163. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to issue one additional gambling boat license to operate on the portion of the Osage River from the Missouri River to the Bagnell Dam;
- require the prescribed location shall include artificial spaces that contain water and are within 500 feet of the 100-year base flood elevation as established by the Federal Emergency Management Agency; and
- require all state revenues derived from the issuance of the gambling boat license shall be appropriated solely for annual increases of teacher salaries?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-424



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 433-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated November 15, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-164. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to issue one additional gambling boat license to operate on the portion of the Osage River from the Missouri River to the Bagnell Dam;
- require the prescribed location shall include artificial spaces that contain water and are within 500 feet of the 100-year base flood elevation as established by the Federal Emergency Management Agency; and
- require all state revenues derived from the issuance of the gambling boat license shall be appropriated to public pre-kindergarten education programs for students in the year prior to kindergarten eligibility?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-425



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

November 27, 2023

OPINION LETTER NO. 434-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated November 15, 2023, for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Greta Bax, 2024-165. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow the Missouri Gaming Commission to issue one additional gambling boat license to operate on the portion of the Osage River from the Missouri River to the Bagnell Dam;
- require the prescribed location shall include artificial spaces that contain water and are within 500 feet of the 100-year base flood elevation as established by the Federal Emergency Management Agency; and
- require all state revenues derived from the issuance of the gambling boat license shall be appropriated to early-childhood literacy programs in public institutions of elementary education?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-426



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

December 1, 2023

OPINION LETTER NO. 435-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 21, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article X, of the Missouri Constitution submitted by Deidre Hirner, 2024-171.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-427



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

December 11, 2023

OPINION LETTER NO. 436-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of December 1, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by JoAnn Franklin, 2024-168. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

December 18, 2023

OPINION LETTER NO. 437-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of December 8, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Deidre Hirner, 2024-170. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no direct costs or savings. Attempts to implement a local tobacco tax, or to modify an existing local tobacco tax, could result in changes in revenue or increased election related or other costs for these entities that cannot be estimated.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General

OP-2023-429



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

December 14, 2023

OPINION LETTER NO. 438-2023

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 4, 2023, for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Article X, of the Missouri Constitution submitted by Deidre Hirner, 2024-172.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General

OP-2023-430



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

December 21, 2023

OPINION LETTER NO. 439-2023

The Honorable Scott Fitzpatrick
Missouri State Auditor
State Capitol, Room 229
Jefferson City, MO 65101

Dear Auditor Fitzpatrick:

This office received your letter of December 11, 2023, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Deidre Hirner, 2024-171. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no direct costs or savings. Attempts to implement a local tobacco tax, or to modify an existing local tobacco tax, could result in changes in revenue or increased election related or other costs for these entities that cannot be estimated.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General